

**BATHAE DUNNE LLP**

Yavar Bathae (CA 282388)  
 Andrew C. Wolinsky (CA 345965)  
 445 Park Avenue, 9th Floor  
 New York, NY 10022  
 Tel.: (332) 322-8835  
 yavar@bathaeedunne.com  
 awolinsky@bathaeedunne.com

**BATHAE DUNNE LLP**

Brian J. Dunne (CA 275689)  
 Edward M. Grauman (admitted *pro hac vice*)  
 901 S. MoPac Expressway  
 Barton Oaks Plaza I, Suite 300  
 Austin, TX 78746  
 Tel.: (213) 462-2772  
 bdunne@bathaeedunne.com  
 egrauman@bathaeedunne.com

*Interim Co-Lead Counsel for the Advertiser  
 Classes*

**SCOTT+SCOTT ATTORNEYS AT LAW  
 LLP**

Amanda F. Lawrence (admitted *pro hac vice*)  
 Patrick J. McGahan (admitted *pro hac vice*)  
 Michael P. Srodoski (admitted *pro hac vice*)  
 156 South Main Street, P.O. Box 192  
 Colchester, CT 06415  
 Tel.: (860) 537-5537  
 alawrence@scott-scott.com  
 pmcgahan@scott-scott.com  
 msrodoski@scott-scott.com

**SCOTT+SCOTT ATTORNEYS AT LAW  
 LLP**

Patrick J. Coughlin (CA 111070)  
 Carmen A. Medici (CA 248417)  
 Hal D. Cunningham (CA 243048)  
 Daniel J. Brockwell (CA 335983)  
 600 W. Broadway, Suite 3300  
 San Diego, CA 92101  
 Tel.: (619) 233-4565  
 pcoughlin@scott-scott.com  
 cmedici@scott-scott.com  
 hcunningham@scott-scott.com  
 dbrockwell@scott-scott.com

UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN FRANCISCO DIVISION

MAXIMILIAN KLEIN, et al.,

Plaintiffs,

vs.

META PLATFORMS, INC.,

Defendant.

Case No. 3:20-cv-08570-JD

**DECLARATION OF MARK YOUNG IN  
 SUPPORT OF ADVERTISER  
 PLAINTIFFS' MOTION FOR CLASS  
 CERTIFICATION**

DATE: December 14, 2023  
 TIME: 10:00 a.m.  
 DEPT. 11, 19th Floor  
 Hon. James Donato

1 I, Mark Young, declare and state as follows:

2 1. I am a named Advertiser Plaintiff in the above-captioned litigation.

3 2. I am a citizen and resident of Scarsdale, New York.

4 3. I am over the age of 18, am personally familiar with, and have personal knowledge  
5 of the facts contained herein, which I could and would testify competently thereto.

6 4. I am aware that this class action lawsuit is brought on behalf of Facebook Inc.  
7 (“Facebook”) advertisers that have been wronged between December 1, 2016, and December 31,  
8 2020.

9 5. Between December 1, 2016, and December 31, 2020, I purchased advertising from  
10 Facebook in six different transactions, spending \$75.57 through my credit cards to do so.

11 6. During this time period, I also bought \$10 of Facebook ads, in six transactions, using  
12 Facebook Coupons.

13 7. On June 30, 2016, I bought \$8.92 in advertising from Facebook through my Visa  
14 card ending in -1893. I understand that this purchase is not within the Class Period proposed for this  
15 case.

16 8. On June 30, 2017, I bought advertising from Facebook in a transaction in the amount  
17 of \$7.00, paid through my Visa card ending in -1893.

18 9. On July 31, 2017, I bought advertising from Facebook in a transaction in the amount  
19 of \$10.00, paid through my Visa card ending in -1893.

20 10. On December 6, 2018, I bought advertising from Facebook in a transaction in the  
21 amount of \$3.00, paid through my Visa card ending in -9033.

22 11. On December 15, 2018, I bought advertising from Facebook in a transaction in the  
23 amount of \$25.00, paid through my Visa card ending in -9033.

24 12. On December 31, 2018, I bought advertising from Facebook in a transaction in the  
25 amount of \$19.82, paid through my Visa card ending in -9033.

26 13. On May 31, 2019, I bought advertising from Facebook in a transaction in the amount  
27 of \$10.75, paid through my American Express card ending in -1006.

1           14. I understand that, by this motion for class certification, I am moving to be appointed  
2 class representative in this action and for my attorneys, Scott+Scott Attorneys at Law LLP and  
3 Bathaee Dunne LLP, to be appointed class counsel. I understand that Advertiser Plaintiffs Katherine  
4 Looper; Jessyca Frederick; Affilious, Inc.; Mark Berney; and 406 Property Services, PLLC are also  
5 moving to be appointed as class representatives.

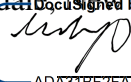
6           15. I understand that a class representative is a representative party who acts on behalf  
7 of other class members in directing the litigation and am willing to serve in this capacity alongside  
8 the Advertiser Plaintiffs.

9           16. I understand that, as a class representative, I have a duty to prosecute the case  
10 vigorously and in the best interests of all class members, which includes reviewing important filings  
11 with the Court, consulting with counsel during the course of the litigation, making recommendations  
12 as to whether or not to accept a particular settlement offer, and testifying at deposition and trial if  
13 called upon to do so. I have already testified at deposition in this case.

14           17. To the best of my knowledge, I have no conflicts of interest with any class member  
15 that would prevent me from fairly and adequately representing the best interests of the class. I  
16 understand that my compensation in this case will be the same as any other class members except  
17 that I may, with Court approval, be reimbursed for my reasonable costs and expenses incurred as a  
18 result of my acting as class representative.

19  
20 I declare under penalty of perjury that the foregoing is true and correct.

21 Executed on \_\_\_\_\_, in Scarsdale, New York.

22   
23 \_\_\_\_\_  
24 Mark Young  
25  
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27  
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